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14 Attorneys for Defendants
15 ESTABLISHMENT LABS HOLDINGS INC.
16 (erroneously sued as ESTABLISHMENT
LABS INC.) and MOTIVA USA LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

21 RAMIN KHADEM,
22 Plaintiff,
23 v.
24 ESTABLISHMENT LABS INC.,
25 MOTIVE USA LLC, and DOES 1-50
26 inclusive,
Defendants.

Case No. 2:23-cv-01044-SVW-ADS
Assigned to the Hon. Stephen V.
Wilson
**JOINT NOTICE OF
SETTLEMENT**
[Local Rules 16-15.7, 40-2]

1 **TO THE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD,**
2 **AND THE CLERK OF THE ABOVE-REFERENCED COURT:**

3 PLEASE TAKE NOTICE that pursuant to Local Rules 16-15.7 and 40-2,
4 Plaintiff RAMIN KHADEM (“Plaintiff”) and Defendants ESTABLISHMENT
5 LABS HOLDINGS and MOTIVA USA LLC (“Defendants”) (collectively, the
6 “Parties”) have reached a settlement that would dispose of the entire case, subject to
7 Court approval. The Parties jointly request that the Court vacate all pending deadlines
8 and the final pretrial conference set for August 7, 2023.

9 Documents are currently being prepared to finalize the resolution of this matter
10 and it is anticipated the Parties will file a stipulation for dismissal within twenty-one
11 days.

12 Dated: July 14, 2023

LAW OFFICE OF ROBIN MONTES

14 /s/ Robin D. Wood
15 Robin D. Wood

16 Attorneys for Plaintiff
17 RAMIN KHADEM

18 Dated: July 14, 2023

LITTLER MENDELSON, P.C.

20 /s/ Heather M. Vigil
21 Heather M. Vigil
Shelley L. Murray

22 Attorneys for Defendants
23 ESTABLISHMENT LABS HOLDINGS
24 INC. (erroneously sued as
ESTABLISHMENT LABS INC.) and
MOTIVA USA LLC

25 I attest that all other signatories listed, and on whose behalf the filing is
26 submitted, concur in the filing’s content and have authorized the filing.

27 /s/ Heather M. Vigil
28 Heather M. Vigil